

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:11-CV-7

UNITED STATES OF AMERICA, :
 :
Plaintiff, :
 : **COMPLAINT FOR FORFEITURE**
vs. : **IN REM**
 :
\$52,352.79 IN UNITED STATES :
CURRENCY, :
 :
Defendant. :

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, states as follows:

1. This is a civil action in rem brought to enforce the provisions of 31 U.S.C. § 5317, providing for the forfeiture of any property involved in violations of 31 U.S.C. § 5324, or any conspiracy to commit any such violation, and any property traceable to such violation or conspiracy.

2. This Court has jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 and 1355. Venue in this district is proper by virtue of 28 U.S.C. §1395.

3. The defendant is \$52,352.79 in United States currency.

4. The defendant is located within the jurisdiction of this Court, it being in the Eastern District of North Carolina. It is presently in the custody of the U. S. Customs and Border Protection, having previously been seized under a Seizure Warrant

issued by United States Magistrate Judge William A. Webb on July 22, 2010, U. S. District Court Docket Number 5:10-MJ-1645.

5. The facts and circumstances supporting the seizure and forfeiture of the defendant are contained in Exhibit A, the Affidavit of Special Agent Christopher E. Brant of the U. S. Department of Homeland Security, Immigration and Customs Enforcement, which are attached hereto and incorporated herein by reference. The facts contained in the affidavit constitute probable cause for the seizure and forfeiture of the defendant.

WHEREFORE, the United States of America prays that a warrant of arrest in rem issue for the arrest of the defendant; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted this 6th day of January, 2011.

GEORGE E.B. HOLDING
United States Attorney

BY: /s/ Stephen A. West
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VERIFICATION

I, Stephen A. West, Assistant United States Attorney for the Eastern District of North Carolina, declare under penalty of perjury, as provided by 28 U.S.C. Section 1746, the following:

That the foregoing Complaint for Forfeiture is based on reports and information furnished to me by Special Agent Christopher E. Brant of the U. S. Department of Homeland Security, Immigration and Customs Enforcement, and to the best of my information and belief, is true and correct.

This the 6th day of January, 2011.

/s/ Stephen A. West
STEPHEN A. WEST
Assistant United States Attorney
Civil Division